

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

ALTERRA AMERICA INSURANCE CO., et al.,

Plaintiffs,

- against -

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

Index No. 652813/2012 E

Hon. Andrea Masley

Mot. Seq. 018

DISCOVER PROPERTY & CASUALTY
COMPANY, et al.,

Plaintiffs,

- against -

NATIONAL FOOTBALL LEAGUE, et al.,

Defendants.

Index No. 652933/2012 E

Hon. Andrea Masley

Mot. Seq. 022

**AFFIRMATION OF
COLIN P. WATSON**

COLIN P. WATSON, pursuant to CPLR 2106, affirms as follows under the penalties of perjury:

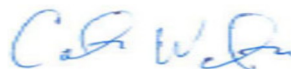
1. I am an attorney associated with Covington & Burling LLP, counsel for Defendants National Football League and NFL Properties LLC (collectively, the “NFL parties”). I am a member in good standing of the bar of the State of New York. I submit this affirmation in support of the NFL parties’ Opposition to Insurers’ Motion for Partial Review of Memorandum and Order of Special Referee Michael Dolinger Regarding Motion to Compel Production of Underlying Litigation and Settlement Materials. This affirmation is based on personal knowledge and my review of the attached documents.

2. Attached as **Exhibit 1** is a true and correct copy of relevant excerpts of the transcript of oral argument held before the Special Referee on November 27, 2018. Exhibit 1 is to be filed under seal.

3. Attached as **Exhibit 2** is a true and correct copy of a memorandum of law, without its attachment, dated October 21, 1994 that The North River Insurance Company, one of the Insurers here, filed in *The North River Insurance Company v. Columbia Casualty Company*, No. 90 Civ. 2518 (S.D.N.Y.). Exhibit 2 was retrieved under my direction from the U.S. District Court for the Southern District of New York.

4. Attached as **Exhibit 3** is a true and correct copy of the Protective Order signed and served on the parties by the Special Referee on March 27, 2019. Exhibit 3 is to be filed under seal.

Dated: Washington, D.C.
March 29, 2019



Colin P. Watson